



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: September 12, 2005
RE: Jasper Seating Co. Inc. / 117-20986-00026
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Chris Berg
Jasper Seating Company, Inc. – Plant #4
P.O. Box 231
Jasper, Indiana 47546

September 12, 2005

Re: 117-20986-00026
First Significant Revision to
FESOP 117-15446-00026

Dear Mr. Berg:

Jasper Seating Company, Inc. – Plant #4 was issued a FESOP on August 9, 2002 for a stationary wood furniture and cabinet coating plant. A letter requesting changes to this permit was received on March 22, 2005. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of the following operations:

- (c) One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat) with a maximum usage rate of 16.5 gallons per hour.
- (d) Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters, and exhausting at stacks S18 and S19, respectively.
- (e) One (1) wood working shop (identified as WW1) with a maximum throughput rate of 2000 pounds of wood pieces per hour, controlled by a baghouse, and exhausting at stack S17.

The facility descriptions are written and numbered as they appear in Sections A and D of the permit.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire FESOP with this revision.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/SD

cc: File – Orange County
U.S. EPA, Region V
Orange County Health Department
Southwest Regional Office
Air Compliance Section Inspector – Gene Kelso
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

**NEW SOURCE REVIEW
AND
FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Jasper Seating Co., Inc. - Plant #4
1352 West Hospital Road
Paoli, Indiana 47454**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F117-15446-00026	
Original Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 9, 2002 Expiration Date: August 9, 2007

First Administrative Amendment No. 117-20266-00026, issued December 23, 2004

First Significant Permit Revision No. 117-20986-00026	Pages Affected: 4, 14, 15, 22-27, 31, 32
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: September 12, 2005



TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
SECTION B	GENERAL CONDITIONS	6
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15]	
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]	
B.22	Transfer of Ownership or Operation [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	
B.24	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	15
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.10	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	
C.11	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	

TABLE OF CONTENTS (Continued)

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 22

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 FESOP [326 IAC 2-8-4] and PSD [326 IAC 2-2]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]
- D.1.4 Particulate [326 IAC 6-3-2(d)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 VOC and HAP Emissions

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.7 Monitoring

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 26

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate [326 IAC 2-2]
- D.2.2 Particulate [326 IAC 2-8]
- D.2.3 Particulate [326 IAC 6-3-2]
- D.2.4 Particulate Control
- D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- D.2.6 Visible Emissions Notations
- D.2.7 Baghouse Inspections
- D.2.8 Broken or Failed Bag Detection

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.9 Record Keeping Requirements

Certification Form 28
Emergency Occurrence Form 29
Quarterly Report Form 31-33
Quarterly Deviation and Compliance Monitoring Report Form..... 34

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood furniture and cabinet coating plant.

Authorized individual: Michael Elliott, President
 Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
 Mailing Address: P.O. Box 231, Jasper, Indiana 47546
 SIC Code: 2521
 Source Location Status: Orange
 County Status: Attainment for all criteria pollutants
 Source Status: Federally Enforceable State Operating Permit (FESOP)
 Minor Source, under PSD;
 Minor Source, Section 112 of the Clean Air Act
 Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Six (6) spray coating booths (identified as PB01, PB02, PB03, PB04, PB05, and PB06), each with a maximum process rate of 1,600 pounds of wood furniture per hour and equipped with either air assisted airless or high volume low pressure (HVLP) spray guns, using dry filters for overspray control of particulates.

Emission Unit	Stack ID	Emission Unit	Stack ID
PB01	S1	Flash Tunnel	S13
	S2		
PB02	S3		
	S4		
PB03	S5		
PB04	S8		
PB05	S11		
PB06	S12		

- (b) One (1) wipe coating operation, with a maximum usage of 0.5 pounds of filler per hour.
- (c) One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat) with a maximum usage rate of 16.5 gallons per hour. This operation was constructed in 2005.
- (d) Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters and exhausting at stacks S18 and S19, respectively. These booths were constructed in 2005.
- (e) One (1) wood working shop (identified as WW1) with a maximum throughput rate of 2,000 pounds of wood pieces per hour, using a baghouse as control and exhausting at stack S17. This operation was constructed in 2005.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

- (1) Three (3) natural gas fired drying ovens.

Emission Unit	Rating (MMBtu/hour)	Stack ID
Oven 1	0.8	S6
		S7
Oven 2	0.8	S9
		S10
Oven 3	1.6	S15
		S16
There is no stack S14.		

- (2) Space heaters:

- (A) Two (2) 1.3 MMBtu/hour natural gas fired units.

- (B) One (1) 8.0 MMBtu/hour natural gas fire make up air unit.

- (b) Electric infrared cure equipment.

- (c) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,

- (2) revised, or

- (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)][326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the

Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Southwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Telephone No.: 1-888-672-8323, or
Telephone No. 812-436-2570
Facsimile No.: 812-436-2572

Failure to notify IDEM, OAQ and Southwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement [326 IAC 2-8-8(a)].
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable;
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are

applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue

Indianapolis, Indiana 46204

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]			
<p>(a) Six (6) spray coating booths (identified as PB01, PB02, PB03, PB04, PB05, and PB06), each with a maximum process rate of 1,600 pounds of wood furniture per hour and equipped with either air assisted airless or high volume low pressure (HVLP) spray guns, using dry filters for overspray control of particulates.</p>			
Emission Unit	Stack ID	Emission Unit	Stack ID
PB01	S1	Flash Tunnel	S13
	S2		
PB02	S3		
	S4		
PB03	S5		
PB04	S8		
PB05	S11		
PB06	S12		
<p>(b) One (1) wipe coating operation, with a maximum usage of 0.5 pounds of filler per hour.</p> <p>(c) One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat) with a maximum usage rate of 16.5 gallons per hour. This operation was constructed in 2005.</p> <p>(d) Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters and exhausting at stacks S18 and S19, respectively. These booths were constructed in 2005.</p> <p>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</p>			

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP [326 IAC 2-8-4] and PSD [326 IAC 2-2]

- (a) The amount of VOC delivered to the roll-coating operation, the spray coating booths, the wipe coating operation, and their associated clean-up activities shall not exceed a total of 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to the roll-coating operation, the spray coating booths, the wipe coating operation, and the amount of any single HAP used for clean-up shall be limited to 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to the roll-coating operation, the spray coating booths, the wipe coating operation, and the amount of any combination of HAPs used for clean-up shall not exceed 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The PM and PM10 emissions from the six (6) spray coating booths shall not exceed 10.8 pounds per hour. This limit is equivalent to 47.4 tons of PM and PM10 per year.
- (e) The PM and PM10 emissions from the two (2) off-line spray coating booths shall not exceed 0.43 pounds per hour. This limit is equivalent to 1.86 tons of PM and PM10 per year.

Combined with the emissions from the woodworking shop (as given in Section D.2) and insignificant activities, the VOC and PM10 emissions from the entire source are limited to less than 100 tons per year each, PM is limited to less than 250 tons per year, and the HAPs emissions are limited to less than 10 tons per year for any single HAP, and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 (PSD) are not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating (spray booths and roller coat) applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from each spray coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and to determine compliance with Conditions D.1.1(d) and D.1.3, the particulate emissions from each spray coating booth shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.6 VOC and HAP Emissions

- (a) Compliance with the VOC usage limitation contained in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the HAP usage limitations contained in Conditions D.1.1(b) and (c) shall be determined using formulation data supplied by the coating manufacturer.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stacks (S1, S2, S3, S4, S5, S8, S11, S12, S18 and S19) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), D.1.1(b), and D.1.1(c) the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1(a), D.1.1(b), and D.1.1(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of each coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents
 - (3) The total HAP and VOC usage for each month; and
 - (4) The weight of VOC and HAP usage for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a), (b), and (c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (e) One (1) wood working shop (identified as WW1) with a maximum throughput rate of 2,000 pounds of wood pieces per hour, controlled by a baghouse, and exhausting at stack S17. This operation was constructed in 2005.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 2-2]

Pursuant to 326 IAC 2-2(PSD), the potential to emit of PM shall not exceed 45.6 pounds per hour from the wood working shop. This limit is equivalent to 200 tons of PM per year from this modification.

Compliance with this limit and Condition D.1.1 renders 326 IAC 2-2 (PSD) not applicable.

D.2.2 Particulate [326 IAC 2-8]

Pursuant to 326 IAC 2-8(FESOP), the potential to emit of PM10 shall not exceed 11.4 pounds per hour from the wood working shop. This limit is equivalent to 50.0 tons of PM10 per year.

Compliance with this limit and Condition D.1.1 renders 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the wood working shop shall not exceed 4.10 pounds per hour when operating at a process weight rate of 2,000 pounds per hour.

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

Compliance with this limit also ensures compliance with Conditions D.2.1 and D.2.2 for PM.

D.2.4 Particulate Control

In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the baghouse for particulate control shall be in operation and control emissions from the wood working shop at all times that the wood working shop is in operation.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the bag house stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the wood working shop when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the bag house stack exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

- (c) To document compliance with Condition D.2.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Jasper Seating Co., Inc. - Plant #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: P.O. Box 231, Jasper, Indiana 47546
FESOP No.: 117-15446-00026

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Jasper Seating Co., Inc. - Plant #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: P.O. Box 231, Jasper, Indiana 47546
FESOP No.: 117-15446-00026

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Telephone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - Plant #4
 Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
 Mailing Address: P.O. Box 231, Jasper, Indiana 47546
 FESOP No.: 117-15446-00026
 Facility: Eight (8) spray coating booths, one (1) roll-coating operation, plus one (1) wipe coating operation
 Parameter: Total VOC delivered to the applicators and used for clean-up
 Limit: Less than 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this month.
- Deviation/s occurred in this quarter.
 Deviation has been reported on _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - Plant #4
 Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
 Mailing Address: P.O. Box 231, Jasper, Indiana 47546
 FESOP No.: 117-15446-00026
 Facility: Eight (8) spray coating booths, one (1) roll-coating operation, plus one (1) wipe coating operation
 Parameter: A single HAP delivered to the applicators and used for clean-up
 Limit: Less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - Plant #4
 Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
 Mailing Address: P.O. Box 231, Jasper, Indiana 47546
 FESOP No.: 117-15446-00026
 Facility: Eight (8) spray coating booths, one (1) roll-coating operation, plus one (1) wipe coating operation
 Parameter: Total HAPs delivered to the applicators and used for clean-up
 Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Jasper Seating Co., Inc. - Plant #4
 Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
 Mailing Address: P.O. Box 231, Jasper, Indiana 47546
 FESOP No.: 117-15446-00026

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Significant Permit Revision
to a Federally Enforceable State Operating Permit (FESOP)**

Source Background and Description

Source Name:	Jasper Seating Company, Inc. – Plant #4
Source Location:	1352 West Hospital Road, Paoli, Indiana 47454
County:	Orange
SIC Code:	2521
Operation Permit No.:	F117-15446-00026
Operation Permit Issuance Date:	August 9, 2002
Significant Permit Revision No.:	117-20986-00026
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a revision application from Jasper Seating Company, Inc. – Plant #4 relating to the operation of one (1) roll coating operation, two (2) off-line spray coating booths, and one (1) wood working shop.

History

Jasper Seating Company, Inc. Plant # 4 is an existing wood furniture and cabinet coating plant currently operating under FESOP No. 17-15446-00026, issued August 9, 2002. On March 22, 2005, the Permittee submitted an application to IDEM, OAQ requesting the removal of six (6) spray coating booths (identified as PB07 through PB12) and a permit to construct and operate one (1) roll coating operation, two (2) off-line spray coating booths, and one (1) wood working shop. The potential to emit of VOC from the new units are equal to 97 tons per year and the potential to emit of PM/PM10 is greater than 250 tons per year.

The Permittee has requested to continue to comply with the provisions of 326 IAC 2-8 (FESOP).

Existing Approvals

The source was issued FESOP No. F117-15446-00026 on August 9, 2002. The source has since received the following:

First Administrative Amendment No. 117-20266-00026, issued December 23, 2004.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S18	FL-offline #1	21	2.83	17,000	Ambient
S19	FL-offline #2	21	2.83	17,000	Ambient
S17	Wood working shop	10	3.33x6.5	48,000	Ambient

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 22, 2005. Additional information was received on April 29, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit of the Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	541
PM10	541
SO ₂	0.00
VOC	97.3
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Ethyl Benzene	0.66
Toluene	8.38
Xylene	4.38
Formaldehyde	0.09
TOTAL	13.5

Justification for Revision

This FESOP is being modified through a FESOP Significant Permit Revision. This revision is being performed pursuant to: 326 IAC 2-8-11.1(f)(5) because the potential to emit of VOC and PM10 are greater than 25 tons per year; and because this revision triggers new applicable requirements for an emission unit.

Potential to Emit After Revision

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Emission Unit	Potential To Emit (tons per year)						
	PM	PM10	SO ₂	VOC	CO	NOx	HAPs
1 Wood working shop (WW1)	*See below	*See below	0.00	0.00	0.00	0.00	0.00
1 Roll Coating Line Operation	0.00	0.00	0.00	Less than 99	0.00	0.00	Less than 10 and 25 tons per year for an single and combination of HAPs, respectively
2 Off-line Spray Coating Booths	Less than 1.86	Less than 1.86	0.00		0.00	0.00	
42 6 Coating Booths	Less than 47.4	Less than 47.4	0.00		0.00	0.00	
1 Wipe Coating	0.00	0.00	0.00		0.00	0.00	
3 Drying Ovens	0.11	0.11	0.70		1.18	1.40	
2 Heaters	0.09	0.09	0.60		0.96	1.14	Negligible
1 Make-Up Air Unit	0.26	0.26	0.02		2.94	3.50	Negligible
Total PTE of the source after the revision	Less than 250	Less than 100	1.32	Less than 99	5.08	6.04	Less than 10 and 25 tons per year for a single and combination of HAPs, respectively.

* The woodworking shop is limited to 45.6 lbs/hour of PM and PM10 (equivalent to 200 tons per year) under the provisions of 326 IAC 2-2 (PSD); to 11.4 lbs/hour of PM10 (equivalent to 50 tons per year) under the provisions of 326 IAC 2-8 (FESOP); and to 4.10 lbs/hour of PM (equivalent to 18 tons per year) under the provisions of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

After the addition of wood working shop and new surface coating operations, the potential to emit of all pollutants from the entire source is still limited to less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 are not applicable to this source.

County Attainment Status

The source is located in Orange County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxide (NOx) emissions are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone. Orange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section under 326 IAC 2-2.
- (b) Orange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the

requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section under 326 IAC 2-2.

- (c) Orange County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section under 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not in one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) This modification is not subject to the requirements of any New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60).
- (b) Pursuant to 40 CFR 63.800(a) and 63.800(b), the Permittee previously accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) that may be used at this source pursuant to 326 IAC 2-8(FESOP), such that the potential to emit a single HAP was limited to less than 10 tons per year and the potential to emit combined HAPs was limited to less than 25 tons per year (see Conditions D.1.1(b) and (c) in the current FESOP). Since this source will continue to comply with these HAP limitations after this modification, there are no emission limitations or other compliance requirements in 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) that are applicable to this source. The Permittee will demonstrate compliance with the HAP limits included in Condition D.1.1 by maintaining copies of the records specified in Condition D.1.8 and submitting the quarterly reports required by Condition D.1.9.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source is not in 1 of 28 source categories and is currently operating under FESOP No. 117-15446-00026, issued August 9, 2002. At the time of construction, the potential to emit of any regulated criteria pollutant were less than 250 tons per year. On March 22, 2005, the Permittee submitted an application to IDEM, OAQ requesting the removal of six (6) existing spray coating booths (identified as PB07 through PB12) and a permit to construct and operate one (1) roll coating operation, two (2) off-line spray coating booths, and one (1) wood working shop controlled by a baghouse. The potential to emit of VOC from the new surface coating operations are equal to 97 tons per year, and the potential to emit of particulate emissions from the new wood working shop are greater than 250 tons per year. However, the baghouse reduces the particulate emissions to less than 250 tons per year. Therefore, a PSD minor source limit has been added to this permit to require use of the baghouse. The source will be limited to 45.6 pounds of PM per hour from the wood working shop. This limit is equivalent to 200 tons of PM per year. Also, the source will be limited to 0.43 pounds of PM per hour from the two off-line spray coating booths. This limit is equivalent to 1.86 tons of PM per year. Compliance with the above limits ensures minor source status under PSD for the entire source.

All other uncontrolled criteria pollutants remain less than 100 tons per year, with the exception of PM₁₀ and VOC which are limited to less than 99 tons per year pursuant to 326 IAC 2-8 (FESOP).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs))

Pursuant to FESOP No. 117-15446-00026, issued August 9, 2002, and the provisions of this permit revision, the operation of this wood furniture and cabinet coating plant, is limited to less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8 (FESOP)

The potential to emit of PM10 from the woodworking shop is greater than the FESOP thresholds (>100 tons per year). However, the Permittee has requested to continue to operate the entire source under the provisions of 326 IAC 2-8 (FESOP). Therefore, the Permittee shall limit the potential to emit of PM10 from the woodworking shop to 11.4 pounds of PM10 per hour. This limit is equivalent to 50 tons of PM10 per year, and the Permittee shall limit the potential to emit of PM10 from the two (2) off-line spray coating booths to 0.43 pounds of PM10 per hour. This limit is equivalent to 1.86 tons of PM10 per year.

State Rule Applicability – Woodworking shop

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the wood working shop shall not exceed 4.10 pounds per hour when operating at a process weight rate of 2,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour;} \\ \text{and } P = \text{process weight rate in tons per hour}$$

The baghouse for particulate control shall be in operation and control emissions from the wood working shop at all times that the wood working shop is in operation.

State Rule Applicability – Roll Coating Operation, and Off-Line Spray Coating Booths

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) Although constructed after January 1, 1980, the one (1) roll coating operation used for applying coatings on wood panels is not subject to the provisions of 326 IAC 8-1-6 because this operation is currently subject to 326 IAC 8-2-12. Facilities that are subject to other Article 8 rules are exempt from the requirements of 326 IAC 8-1-6.
- (b) Although the potential VOC emissions from each of the two (2) off-line spray coating booths are greater than 25 tons per year, these units are not subject to the provisions of 326 IAC 8-1-6 because they are used for applying coating to wood furniture and cabinets. Therefore, they are subject to the provisions of 326 IAC 8-2-12.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12(Wood Furniture and Cabinet Coating), the surface coating (spray booths and roller coat) applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 6-3-2 (Process Operations)

- (a) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P the particulate matter (PM) from the two (2) off-line spray coating booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, pursuant to 326 IAC 6-3-2(d), particulate from the two (2) off-line spray coating booths shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) The one (1) roll coating operation is not subject to the provisions of 326 IAC 6-3-2 (Process Operations) because there are no particulate emissions from this operation.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous

compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this unit are as follows:

- (a) The wood working shop has applicable compliance monitoring conditions as specified below:
- (1) Visible Emission Notations
Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
 - (2) Baghouse Inspections
An inspection shall be performed each calendar quarter of all bags controlling the wood working shop when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.
 - (3) Broken or Failed Bag Detection
In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible

emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the wood working shop must operate properly to ensure compliance with 326 IAC 2-2(PSD), 326 IAC 2-8 (FESOP) and 326 IAC 6-3-2(Particulate Emission Limitations for Manufacturing Processes).

- (b) The one (1) roll coating operation and two (2) off line spray coating booths shall comply with the compliance monitoring conditions as specified in Section D.1 of existing FESOP No. 117-15446-00026.

Proposed Changes

Language with a line through it has been deleted, and bold language has been added.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

- (a) ~~Twelve (12)~~ **Six (6)** spray coating booths (identified as PB01, PB02, PB03, PB04, PB05, **and** PB06, ~~PB07, PB08, PB09, PB10, PB11, and PB12~~), each with a maximum process rate of 1,600 pounds of wood furniture per hour and equipped with either air assisted airless or high volume low pressure (HVLP) spray guns, using dry filters for overspray control of particulates.
- ...
- (c) **One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat) with a maximum usage rate of 16.5 gallons per hour. This operation was constructed in 2005.**
- (d) **Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters and exhausting at stacks S18 and S19, respectively. These booths were constructed in 2005.**
- (e) **One (1) wood working shop (identified as WW1) with a maximum throughput rate of 2,000 pounds of wood pieces per hour, controlled by a baghouse and exhausting at stack S17. This operation was constructed in 2005.**

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]			
(a) Twelve (12) Six (6) spray coating booths (identified as PB01, PB02, PB03, PB04, PB05, and PB06, PB07, PB08, PB09, PB10, PB11, and PB12), each with a maximum process rate of 1,600 pounds of wood furniture per hour and equipped with either air assisted airless or high volume low pressure (HVLP) spray guns, using dry filters for overspray control of particulates.			
Emission Unit	Stack ID	Emission Unit	Stack ID
PB01	S1	PB07	S17
	S2	PB08	S18
PB02	S3	PB09	S19
	S4	PB10	S20
PB03	S5	PB11	S21
PB04	S8	PB12	S22
PB05	S11	Flash Tunnel	S13
PB06	S12		
(b) One (1) wipe coating operation, with a maximum usage of 0.5 pounds of filler per hour.			
(c) One (1) roll coating operation, identified as Flat Line, utilizing UV coatings (stain, sealer and top coat) with a maximum usage rate of 16.5 gallons per hour. This operation was constructed in 2005.			
(d) Two (2) off-line spray coating booths, identified as FL Off-line #1 and FL Off-line #2, each with a maximum usage rate of 1.50 gallons per hour, utilizing HVLP or air assisted airless application technologies and controlled by dry filters and exhausting at stacks S18 and S19, respectively. These booths were constructed in 2005.			
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)			

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense [IC 13]

~~This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.~~

D.1.2 Effective Date of the Permit [IC 13-15-5-3]

~~Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.~~

D.1.3 Revision to Permit [326 IAC 2]

~~All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.~~

D.1.4 Affidavit of Construction [326 IAC 2]

~~The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015, verifying that the emission units were constructed as proposed in the application.~~

D.1.51 FESOP [326 IAC 2-8-4] and PSD [326 IAC 2-2]

Pursuant to ~~326 IAC 2-8-4 (FESOP):~~

- (a) The amount of VOC delivered to **the roll-coating operation**, all the spray coating booths, the wipe coating operation, and their associated clean-up activities shall not exceed a total of 99 tons per twelve (12) consecutive month period, **with compliance determined at the end of each month.**
- (b) The amount of any single HAP delivered to **the roll-coating operation**, the spray coating booths, the wipe coating operation, and the amount of any single HAP used for clean-up shall be limited to 10 tons per twelve (12) consecutive month period, **with compliance determined at the end of each month.**
- (c) The amount of any combination of HAPs delivered to **the roll-coating operation**, the spray coating booths, the wipe coating operation, and the amount of any combination of HAPs used for clean-up shall not exceed 25 tons per twelve (12) consecutive month period, **with compliance determined at the end of each month.**
- (d) The **PM and PM10** emissions from all the **six (6)** spray coating booths shall not exceed **10.8 pounds per hour. This limit is equivalent to 47.4 tons of PM and PM10 per year.**
- (e) **The PM and PM10 emissions from the two (2) off-line spray coating booths shall not exceed 0.43 pounds per hour. This limit is equivalent to 1.86 tons of PM and PM10 per year.**

Combined with the emissions from the **woodworking shop (as given in Section D.2)** and insignificant activities, the VOC and PM10 emissions from the entire source are limited to less than 100 tons per year each, **PM is limited to less 250 tons per year**, and the HAPs emissions are limited to less than 10 tons per year for any single HAP, and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 (PSD) are not applicable.

D.1.62 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating (**spray booths and roller coat**) applied to wood furniture and cabinets shall utilize one of the following application methods:

...

D.1.73 Particulate Matter (PM) [40 CFR 52, Subpart P] [326 IAC 6-3-2]

Pursuant to ~~326 IAC 6-3-2(c) (Process Operations)~~ **40 CFR 52, Subpart P**, the allowable **PM particulate** emissions rate from each spray coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

...

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to **326 IAC 6-3-2(d)** and to determine compliance with **Conditions D.1.1(d) and D.1.3**, the particulate emissions from each spray coating booth shall be controlled by **dry particulate filters**, and the Permittee shall operate the control device in accordance with **manufacturer's specifications.**

D.1.85 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.1.9 VOC and HAP Emissions

~~Compliance with Conditions D.1.5(a), (b), (c) shall be demonstrated within 30 days of the end of each month based on the total VOC and HAP usage for the most recent twelve (12) month period.~~

D.1.106 VOC and HAP Emissions

- (a) Compliance with the VOC usage limitation contained in Condition D.1.51(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) **by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets.** ~~using formulation data supplied by the coating manufacturer.~~ IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the HAP usage limitations contained in Conditions D.1.1(b) and (c) shall be determined using formulation data supplied by the coating manufacturer.

D.1.11 PM and PM10 Emissions

~~In order to comply with Conditions D.1.5(d) and D.1.7, the dry filters used in the spray coating booths for PM control shall be in operation at all times when the spray coating booths are in operation.~~

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.127 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stacks (S1, S2, S3, S4, S5, ~~S6, S7, S8, S9, S10, S11, and S12, S18 and S19~~) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. ~~Preparation, Implementation, Records, and Reports in Failure to take response steps in~~ accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

...

D.1.138 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.51(a), D.1.51(b), and D.1.51(c) the Permittee shall maintain records in accordance with (1) through (34) below. Records maintained for (1) through (34) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.51(a), D.1.51(b), and D.1.51(c). **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
 - (1) ~~The amount, VOC content, and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) **The amount of each coating material and solvent less water used on a monthly basis.**
 - (A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents

- (23) The total HAP and VOC usage for each month; and
 - (34) The weight of VOC and HAP usage for each compliance period.
- (b) To document compliance with Condition D.1.427, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ...

D.1.149 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.51(a), (b), and (c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (e) **One (1) wood working shop (identified as WW1) with a maximum throughput rate of 2,000 pounds of wood pieces per hour, controlled by a baghouse and exhausting at stack S17. This operation was constructed in 2005.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 2-2]

Pursuant to 326 IAC 2-2(PSD), the potential to emit of PM shall not exceed 45.6 pounds per hour from the wood working shop. This limit is equivalent to 200 tons of PM per year from this modification.

Compliance with this limit and Condition D.1.1 renders 326 IAC 2-2 (PSD) not applicable.

D.2.2 Particulate [326 IAC 2-8]

Pursuant to 326 IAC 2-8(FESOP), the potential to emit of PM10 shall not exceed 11.4 pounds per hour from the wood working shop. This limit is equivalent to 50.0 tons of PM10 per year.

Compliance with this limit and Condition D.1.1 renders 326 IAC 2-7 (Part 70 Permit Program) not applicable to the source.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the wood working shop shall not exceed 4.10 pounds per hour when operating at a process weight rate of 2,000 pounds per hour.

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

Compliance with this limit also ensures compliance with Conditions D.2.1 and D.2.2 for PM.

D.2.4 Particulate Control

In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the baghouse for particulate control shall be in operation and control emissions from the wood working shop at all times that the wood working shop is in operation.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the bag house stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the wood working shop when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports,

shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the bag house stack exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - Plant #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: P.O. Box 231, Jasper, Indiana 47546
FESOP No.: 117-15446-00026
Facility: ~~Twelve (12)~~ **Eight (8)** spray coating booths, **one (1)** roll-coating operation, plus one (1) wipe coating operation
Parameter: Total VOC delivered to the applicators and used for clean-up
Limit: Less than 99 tons per twelve (12) consecutive month period, **with compliance determined at the end of each month**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - Plant #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: P.O. Box 231, Jasper, Indiana 47546
FESOP No.: 117-15446-00026
Facility: ~~Twelve (12)~~ **Eight (8)** spray coating booths, **one (1) roll-coating operation**, plus one (1) wipe coating operation
Parameter: A single HAP delivered to the applicators and used for clean-up
Limit: Less than 10 tons per twelve (12) consecutive month period, **with compliance determined at the end of each month**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - Plant #4
Source Address: 1352 West Hospital Road, Paoli, Indiana 47454
Mailing Address: P.O. Box 231, Jasper, Indiana 47546
FESOP No.: 117-15446-00026
Facility: ~~Twelve (12)~~ **Eight (8)** spray coating booths, **one (1) roll-coating operation**, plus one (1) wipe coating operation
Parameter: Total HAPs delivered to the applicators and used for clean-up
Limit: Less than 25 tons per twelve (12) consecutive month period, **with compliance determined at the end of each month**

Upon further review, IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The mailing address for IDEM has been changed throughout the permit as follows.

Indiana Department of Environmental Management
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204**

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

...

- (b) Pursuant to ~~326 IAC 2-2 (Prevention of Significant Deterioration (PSD))~~, **The** potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

...

2. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule was effective March 16, 2005; therefore, the

condition reflecting this rule will be incorporated into the permit as follows:

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

Conclusion

This permit revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 117-20986-00026.

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
From New Surface Coating Operations**

Company Name: Jasper Seating Co., Inc. Plant # 4
Address: 1352 West Hospital Road, Paoli, Indiana 47454
SPR: 117-20986
Plant ID: 117-00026
Reviewer: ERG/SD
Date: May 3, 2005

Process Booth ID	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hour)	Pounds VOC per gallon of Coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	Transfer Efficiency	Items	
Flat Line UV Coat	Stain	9.37	0.60%	0.0%	0.60%	0.0%	99.2%	5.50	0.06	0.31	7.42	1.35	0.00	100%	Wood Panels	
	Sealer	9.69	1.10%	0.0%	1.10%	0.0%	98.7%	5.50	0.11	0.59	14.1	2.57	0.00	100%	Wood Panels	
	Topcoat	9.09	3.50%	0.0%	3.50%	0.0%	95.5%	5.50	0.32	1.75	42.0	7.66	0.00	100%	Wood Panels	
Off Line 1 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	1.50	6.52	9.78	235	42.9	0.93	75%	Wood Panels/Pieces/Edges	
Off Line 2 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.00%	1.50	6.52	9.78	235	42.9	0.93	75%	Wood Panels/Pieces/Edges	
													97.3	1.86		

Material in the Flat Line UV is applied by roll coating.

Material in the 2 Off line spray booth is applied using HVLP or air assisted airless spray technologies, and controlled by dry filters.

* The washcoat is the worst case coating.

METHODOLOGY

Pounds of VOC per Gallon of Coating = Density (lb/gal) * Weight % Organics

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 24 hours/day

PTE of VOC (tons/year) = Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Maximum (units/hour) * Gal of Material (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
HAP Emissions
From New Surface Coating Operations**

Company Name: Jasper Seating Co., Inc. Plant # 4
Address: 1352 West Hospital Road, Paoli, Indiana 47454
SPR: 117-20986
Plant ID: 117-00026
Reviewer: ERG/SD
Date: May 3, 2005

Process Booth ID	Material	Density (lb/gal)	Gal of Material (gal/hour)	Weight % Ethyl Benzene	Weight % Toluene	Weight % Xylene	Weight % Formaldehyde	PTE of Ethyl Benzene	PTE of Toluene	PTE of Xylene	PTE of Formaldehyde
Flat Line UV Coating	Stain	9.37	5.50					0.00	0.00	0.00	0.00
	Sealer	9.69	5.50					0.00	0.00	0.00	0.00
	Topcoat	9.09	5.50	0.30%		2.00%		0.66	0.00	4.38	0.00
Off Line 1 Spray Coat	* Washcoat	7.09	1.50		9.00%		0.10%	0.00	4.19	0.00	0.05
Off Line 2 Spray Coat	* Washcoat	7.09	1.50		9.00%		0.10%	0.00	4.19	0.00	0.05
								0.66	8.38	4.38	0.09

Total PTE of HAPs (tons/year) = 13.5

Material in the Flat Line UV is applied by roll coating.
 Material in the 2 Off line spray booth is applied using HVLP or air assisted airless spray technologies, and controlled by dry filters.
 * The washcoat is the worst case coating.

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Particulate Emissions
From New Wood Working Operations**

Company Name: Jasper Seating Co., Inc. Plant # 4
Address: 1352 West Hospital Road, Paoli, Indiana 47454
SPR: 117-20986
Plant ID: 117-00026
Reviewer: ERG/SD
Date: May 3, 2005

Potential To Emit of Particulate (tons/year)

Unit		After Control (tons/year)	Before Control (tons/year)	* Particulate Emission Limit (lbs/hour)
Dust Collector				
Grain Loading (grains/acf)	0.003	5.41	541	4.10
Air Flow Rate (acf/minute)	48000			
Control Efficiency (%)	99%			

Assume all PM emissions are equal to PM10, and all PM10 emissions are equal to PM2.5.

* As calculated using the Proces Weight Rule [326 IAC 6-3-2]

METHODOLOGY

After Control PTE of PM/PM10 (tons/year) = Grain loading (gr/acf) * Air flow rate (acf/minute) * 60 minute/hour * 1 lb/7000 grains * 8760 hours/year * 1 ton/2000 lbs.

Before Control PTE of PM/PM10 (tons/year) = Grain loading (gr/acf) * Air flow rate (acf/minute) * 60 minute/hour * 1 lb/7000 grains * 8760 hours/year * 1 ton/2000 lbs * 1/(1-Control Effic

**Appendix A: Emissions Calculations
Summary**

Company Name: Jasper Seating Co., Inc. Plant # 4
Address: 1352 West Hospital Road, Paoli, Indiana 47454
SPR: 117-20986
Plant ID: 117-00026
Reviewer: ERG/SD
Date: May 3, 2005

Potential To Emit (tons per year)

Emission Units	PM	PM10	VOC	NOx	SO ₂	CO	Total HAPs
Surface Coating Operations	1.86	1.86	97.3	0.00	0.00	0.00	13.5
Wood Working Shop	18.0	18.0	0.00	0.00	0.00	0.00	0.0
TOTAL	19.8	19.8	97.3	0.00	0.00	0.00	13.5

The Permittee has requested to continue to comply with the provisions of 326 IAC 2-8 (FESOP) that limits each criteria pollutant to less than 100 tons per year, and in addition

- 1) Surface coating operations are subject to the provisions of 326 IAC 8-2-12; and
- 2) Wood working operations are subject to the provisions of 326 IAC 6-3-2.